

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
JOANNE L. DIAMOND
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577
5 Joanne_Diamond@fd.org

6 Attorney for Josue Abraham Reynoso Ochoa

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 JOSUE ABRAHAM REYNOSO OCHOA,

14 Defendant.
15

Case No. 2:22-mj-00864-NJK

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
18 Frierson, United States Attorney, and Edward G. Veronda, Assistant United
19 States Attorney, counsel for the United States of America, and Rene L.
20 Valladares, Federal Public Defender, and Joanne L. Diamond, Assistant Federal
21 Public Defender, counsel for Josue Abraham Reynoso Ochoa, that the
22 Preliminary Hearing currently scheduled on November 16, 2022 at 4:00 p.m., be
23 vacated and continued to a date and time convenient to the Court, but no sooner
24 than thirty (30) days.
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1 This Stipulation is entered into for the following reasons:

2 1. The parties require additional time to discuss the potential for a
3 Pre-Indictment negotiation.

4 2. Counsel for the defendant will require additional time to review and
5 investigate discovery and meet with the client to discuss the details prior to
6 proceeding.

7 3. Mr. Reynoso-Ochoa is out of custody and agrees to the continuance.

8 4. The parties agree to the continuance.

9 5. Additionally, denial of this request for continuance could result in a
10 miscarriage of justice.

11 6. The additional time requested by this Stipulation is excludable in
12 computing the time within which the trial herein must commence pursuant to
13 the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A),
14 considering the factors under Title 18, United States Code, Section
15 3161(h)(7)(B)(i), (iv).

16 This is the first request for continuance filed herein.

17 DATED: November 7, 2022.

18
19 RENE L. VALLADARES
20 Federal Public Defender

JASON M. FRIERSON
United States Attorney

21 By /s/ Joanne L. Diamond

By /s/ Edward G. Veronda

22 JOANNE L. DIAMOND
Assistant Federal Public Defender

EDWARD G. VERONDA
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4 Plaintiff,

5 v.

6 JOSUE ABRAHAM REYNOSO OCHOA,
7 Defendant.
8

Case No. 2:22-mj-00864-NJK

ORDER

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently
12 scheduled on November 16, 2022 at the hour of 4:00 p.m., be vacated and
13 continued to December 20, 2022, at 4:00 p.m.

14 DATED: November 7, 2022.

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UNITED STATES MAGISTRATE JUDGE